ATI
Specialty Alloys
& Components
1600 Old Salem Road NE
PO Box 460
Albany, OR 97321-0460
Tel: 541-926-4211
Fax: 541-812-7456
ATImetals.com

December 10, 2018

Ms. Sheryl Bilbrey
Director EPA Region 10 Office of Environmental Cleanup
1200 6th Avenue
Seattle, WA 98101

Subject: Petition for Partial Deletion from National Priorities List (NPL) - Teledyne Wah Chang Superfund Site, Albany, Oregon

Dear Ms. Bilbrey,

The Teledyne Wah Chang facility in Albany, Oregon, now known as TDY Industries, LLC d/b/a ATI Specialty Alloys & Components - Millersburg Operations (TDY), was listed on the National Priorities List (NPL) in 1983.[1] TDY entered into an associated Consent Order and Agreement in 1996. Since that time, a tremendous amount of work has been completed at the TDY Site. That work involved characterizing contamination, assessing human health and environmental risks, removing wastes and contaminated media, installing and operating groundwater remediation systems, conducting the required monitoring, and providing summary reports to the U.S. Environmental Protection Agency (EPA). Through that work, many of the remedial action objectives (RAOs) set forth in the Site's three Records of Decision (RODs) have been met.

After 35 years of work with EPA and the Oregon Department of Environmental Quality (DEQ), there is a sound basis for deleting portions of the TDY Site from the NPL, consistent with EPA's goal for focusing resources to maximize NPL deletions and partial deletions at eligible sites. TDY wishes to engage EPA, with DEQ's concurrence, in pursuing this process. This letter is a formal petition to EPA to delete a portion of the TDY Site known as the Farm Ponds from the NPL.

I. Background on the TDY Site and Farm Ponds

As shown in Figure 1, the TDY Site is located between the Willamette River and Interstate 5 in Millersburg, Linn County, Oregon. During the remedial investigation/feasibility study (RI/FS) the Site was organized into the following geographic areas:

- The 110-acre Main Plant (which is organized into the Extraction Area, Fabrication Area, and Solids Area); and

[1] Referred to herein as the "TDY Site" or the "Site."

- The 115-acre Farm Ponds Area (which is organized into the Farm Ponds and the Soil Amendment Area, as shown in Figure 2).

This geographic organization was incorporated into the RODs that apply to the Site and has remained consistent throughout the project.

The Site's geographic areas are physically and hydraulically separate. The Main Plant lies ¾ mile to the south of the Farm Ponds Area. The properties separating the Main Plant and the Farm Ponds Area are not owned by TDY and were never part of the NPL designation.

This petition requests deletion of a discrete portion of the Farm Ponds Area: the Farm Ponds.[2] The Farm Ponds consist of five tax lots owned by TDY, as shown in Figure 2. Collectively, the Farm Ponds tax lots encompass approximately 75 acres and are zoned for industrial use.

II. Request for Deletion of the Farm Ponds from the NPL

Deleting the Farm Ponds from the NPL will promote development by enabling the property to be returned to productive use. This aligns with the recommendations and top priorities of EPA's Superfund Task Force and Redevelopment Initiative. The Farm Ponds property is a shovel-ready brownfield. It is highly marketable because of its unique location, straddling the BNSF Railroad Company and Union Pacific Railroad rail lines and close to Interstate 5. This location makes it attractive for industrial development, consistent with other neighboring land uses.

The local economy would benefit directly from the redevelopment of the Farm Ponds, which deletion from the NPL will enable. In addition, deleting the Farm Ponds from the NPL would clearly demonstrate to the local community and public-at-large the significant progress that has been made at the Site. Given these benefits, we expect this action will be strongly supported by the State of Oregon, as well as the communities of Millersburg and Albany.

III. Next Steps

We ask that EPA support this petition and work with TDY on completing the technical and procedural steps to accomplish deleting the Farm Ponds from the NPL as soon as possible in 2019. Additional background on the technical justification for this partial deletion request is provided as an attachment to this letter (the "Attachment").

To start this process, we would like to meet with you and your staff to discuss this petition and the steps required to achieve this goal. As Business Unit President of TDY SA&C, I am eager to begin this exciting work with you. I will contact your office in the next several weeks to schedule a meeting. While we are

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[2] The Soil Amendment Area of the Farm Pond Parcels is not included in this deletion petition. The Soil Amendment Area (SAA) is a 47.8-acre tract of farmland located directly north of the Farm Ponds (tax lots 00108 and 00101 shown in Figure 2). This parcel was transferred to the City of Millersburg in 1994 (EPA, 2008). In 1976, the Soil Amendment Area received one permitted application of lime solids from the plant's Central Wastewater Treatment System to assess whether the material would provide agronomic benefit as a soil amendment (CH2M Hill, 1993). In recent times, this parcel has been used for growing grass seed and other non-food crops. The Main Plant is likewise not included in this deletion petition. The Main Plant is an active manufacturing facility and will continue to be monitored and remediated under the applicable RODs.

pleased to invite you to meet at our facility, so you can see the property firsthand, we are happy to come to your office in Seattle. Thank you for your time and consideration of this request.

Sincerely,

Lee Weber
Business Unit President, ATI Specialty Alloys and Components

cc: Ravi Sanga/EPA Regional Project Manager
Keith Anderson/ Oregon Department of Environmental Quality
Michael Kucinski/ Oregon Department of Environmental Quality
Lydia Emer/Oregon Department of Environmental Quality
Ann Farris/Oregon Department of Environmental Quality

ATTACHMENT

RATIONALE SUPPORTING PARTIAL DELETION of FARM PONDS FROM THE TDY SITE

Operable Units

The TDY Site is divided into four Operable Units (OUs) as shown in the table below. This petition requests delisting of the Farm Ponds, which is a distinct geographical area that is incorporated in the Records of Decision (RODs), for both OU2 and OU3.[3]

Operable Unit	Operable Unit Name	Geographic Area(s) Impacted by Selected Remedy	Status [1]
OU1	Sludge Ponds	Solids Area only	Protective [2]
OU2	Groundwater and Sediment	Sitewide (all areas)	Short-Term Protective
OU3	Surface and Subsurface Soils	Sitewide (all areas)	Short-Term Protective
OU4	Soil Amendment Area	NA	No ROD

NOTES:

NA = Not Applicable because no ROD has been issued

(1) From EPA (2017)

(2) Certificate of Completion Issued on June 30, 1993

Farm Ponds Cleanup Requirements and History

The Farm Ponds were used by TDY from 1979 to 1993 for wastewater treatment and operated under a National Pollutant Discharge Elimination System (NPDES) permit from the State of Oregon (EPA, 2008). The wastewater treatment process consisted of a pumping station and four 2.5-acre wastewater settling ponds that removed lime solids from the plant's wastewater stream before discharge to surface water under the NPDES permit. Use of the Farm Ponds for wastewater treatment was terminated in 1993. Following cessation of operations, TDY removed all accumulated lime solids and, with the approval of EPA, disposed of this material at Columbia Ridge Landfill in Arlington, Oregon. All wastewater equipment was removed from the property and the ground surface was regraded to prepare the property for future industrial redevelopment (CH2M Hill, 1998; CH2M Hill, 2003; EPA, 2008).

Prior to the NPL designation, groundwater monitoring was conducted at the Farm Ponds under the NPDES permit. Additional groundwater monitoring was initiated during the Site-wide Remedial Investigation/Feasibility Study (RI/FS) to further define potential contamination of groundwater resulting from wastewater treatment operations in this area. Constituents were found in shallow

[3] The Farm Ponds are not subject to OU1 or OU4.

groundwater in the immediate vicinity of the ponds that included chlorinated solvents and inorganic contaminants/general geochemical parameters at concentrations exceeding acceptable levels.[4] Since the potential future use of the Farm Ponds was uncertain at the time of the RI/FS (two and a half decades ago), EPA required the risk assessment be developed using a hypothetical future residential exposure scenario.

Operable Unit 2

The ROD for OU2 (groundwater and sediment) identified groundwater extraction in source or 'hot spot' areas for gradient control and portions of the Site, including in the Farm Ponds. EPA considered groundwater to be a hot spot if groundwater contamination exceeded the cancer risk of 10^{-04} and/or had a noncancer HI substantially greater than 1. Additional data collected as a part of the OU2 ROD implementation indicated that the 10^{-04} cancer risk for residential use was only exceeded at two of the Farm Ponds monitoring wells, and was only slightly exceeded (CH2M Hill, 1999).

Since the impacts were very limited, the EPA-approved groundwater remedy in the Farm Ponds required:

- Groundwater in exceedance of maximum contaminant levels (MCLs) or non-zero MCL goals, or cancer risks greater than 10^{-06} and HI substantially greater than 1, shall be prevented from migrating beyond the historic plume boundary identified in the ROD.
- Deed restrictions on the construction and use of groundwater wells for drinking water supply and access controls shall be implemented.
- Long-term monitoring shall be conducted to monitor the protectiveness remedy.

As the overall cleanup progressed throughout the Site, it became apparent to EPA that modifications to the OU2 ROD were needed to clarify remediation requirements and compliance points. In 1998, EPA issued an Explanation of Significant Differences (ESD) that eliminated the requirement for offsite groundwater extraction along the western and northern plant boundaries and clarified the remediation requirements for the Farm Ponds Area (EPA, 1998). Specifically, this ESD modified the compliance boundary in the Farm Ponds Area from the edge of the former ponds to the property boundary in the Farm Ponds Area. This change was made so that compliance boundaries were consistently applied across the TDY Site and to ensure that groundwater with unacceptable levels of contamination is not exiting property controlled by TDY. This change is important in pursuing deletion of the Farm Ponds from the NPL because concentrations in all wells at the property boundary in the Farm Ponds have been below the standards established in Table 10-1 of the OU2 ROD since 1991.[5]

Operable Unit 3

The ROD for OU3 (surface and subsurface soil) also nominally applies to the Farm Ponds. During the remedial investigation, surface and subsurface soil samples were collected in the Farm Ponds. As discussed in Section 7 of the OU3 ROD, a risk assessment was conducted to evaluate risks to hypothetical future residents. The ROD acknowledges this approach is conservative because people do

[4] The sampling results are set forth in Table 10-1 of the OU2 ROD.

[5] In April 1991, tetrachloroethene was detected at a concentration of 7 micrograms per liter (ug/L) in monitoring well NS, above the ROD standard of 5 ug/L.

not live on the property, and future residential use is prohibited by the industrial zoning. The ROD concluded that no remedial actions were required for the Farm Ponds.[6]

Rationale for Deleting the Farm Ponds from the NPL

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) states that releases may be deleted from the NPL where no further response is appropriate [see 40 CFR 300.425(e)]. Moreover, EPA's longstanding policy supports the deletion of releases at portions of NPL sites, where no further response is appropriate [see 60 Fed. Reg. 55,466]. In 2017, the Superfund Task Force emphasized the importance of moving sites toward NPL deletion (full or partial) to promote reuse of these sites. Here, for the reasons described below, no further response is appropriate at the Farm Ponds and, accordingly, the Farm Ponds portion of the TDY Site should be deleted from the NPL and allowed to return to productive use.

Operable Unit 2

As it applies to the Farm Ponds, the OU2 ROD includes certain remedial action objectives (RAOs) for groundwater. TDY has conducted a significant amount of work in the Farm Ponds to meet these groundwater RAOs, which we believe have been effectively met. A summary of the OU2 groundwater RAOs and how they have been met in the Farm Ponds are provided below.

- ***RAO 1 - Prevent people from drinking groundwater containing contaminant levels above federal or state drinking water standards.***

Wastewater treatment operations ceased over 25 years ago, the lime solids have been removed, and the ponds have been regraded and closed under the former NPDES permit. Zoning to maintain industrial land use is in place.[7] Restrictive covenants prohibiting groundwater use are in place on all of the five Farm Ponds tax lots. These restrictions prevent people from drilling wells and drinking groundwater.

- ***RAO 2 - Prevent contaminated groundwater above federal or state drinking water standards from leaving the TWCA property boundary.***

Since 1991, the OU2 ROD standards for all chemicals have been met at the boundary. The lone exception is for manganese, which is naturally elevated in this area of the Willamette Valley. Importantly, the ROD standard for manganese, established in 1994, is a secondary MCL (non-health based). In June 2011, EPA approved DEQ's request to remove manganese from its fresh water quality standards (OAR 340-041). Accordingly, EPA informed TDY that manganese will not be a driver for remedial activities outside of long-term monitoring, and when EPA applies the new standards set by DEQ, the manganese criteria no longer applies (email from Ravi Sanga/EPA to Noel Mak/TDY dated July 29, 2011).

[6] In Section 8.0 of the ROD, EPA concludes remedial actions are only required in the Soil Amendments Area of the Farm Ponds Area ("[i]n the Farm Ponds Area, the Soil Amendment Area is the area where remediation is required.")
[7] The Farm Ponds are zoned for General Industrial use by the City of Millersburg.

- ***RAO 3 - Reduce the concentrations of TWCA-related organic, inorganic, or radionuclide compounds in groundwater to concentrations below federal or state drinking water standards or other risk-based levels***.

Groundwater contamination above the OU2 ROD standards for TWCA-related compounds is currently limited to one shallow well[8] that contains trace levels of volatile organic compounds (VOCs) that are slightly above the cleanup standards. These concentrations will continue to decrease through natural attenuation process and are expected to drop below the ROD standard within several years. Manganese (discussed above) and arsenic (in a single upgradient well) slightly exceed ROD standards, but are naturally-occurring metals and unrelated to site activities. Regardless, groundwater use and human exposure is prevented by institutional controls and, therefore, there is no risk to human health.

- ***RAO 4 - Prevent groundwater containing TWCA-related organic, inorganic, or radionuclide compounds above federal or state standards from discharging into nearby surface waters.***

The groundwater concentrations measured in at the property perimeter closest to surface water confirm there is no contaminated groundwater from the Farm Ponds discharging into nearby surface waters.

Operable Unit 3

The OU3 concluded that no remedial actions were required for the Farm Ponds because of the low risks from exposure to soils.

[8] Data from the spring 2018 groundwater monitoring event found that three VOCs exceeded the ROD standard in monitoring well PW-104S. The TCE concentration was 7.6 ug/L (ROD standard is 5 ug/L); the 1, 1, 2-TCA concentration was 8.96 ug/L (ROD standard is 3 ug/L); the 1, 2-DCA concentration was 6.74 ug/L (ROD standard is 5 ug/L).

Citations

CH2M Hill, 1993. RI/FS Report Teledyne Wah Chang Albany. March. Prepared by: CH2M Hill.

CH2M Hill, 1998. Groundwater Remedial Design Report/Remedial Action Report Work Plan for the Wah Chang Facility—Farm Ponds Area. Prepared by: CH2M Hill. Prepared for: Oremet-Wah Chang. December.

CH2M Hill, 1999. Groundwater Remedial Design Report/Remedial Action Work Plan for the Wah Chang Facility—Farm Ponds Area, Addendum No. 1. Prepared for: Oremet Wah Chang. Prepared by: CH2M Hill. May.

CH2M Hill, 2003. Three-Year Evaluation Report for Farm Ponds Groundwater. Prepared for: Wah Chang. Prepared by: CH2M Hill. May.

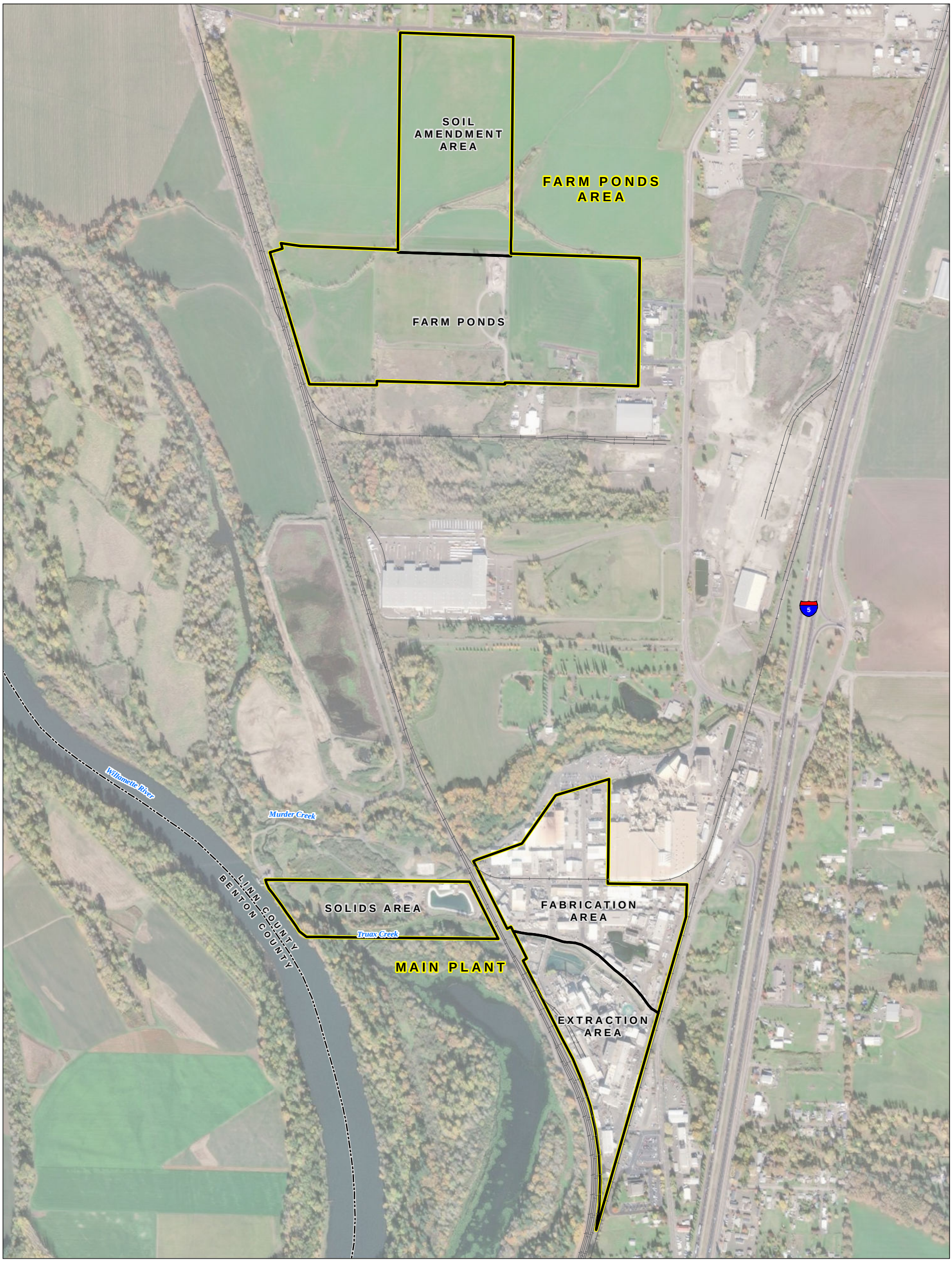
EPA, 1994. Record of Decision Declaration, Decision Summary, and Responsiveness Summary for Final Remedial Action of Groundwater and Sediments Operable Unit, Teledyne Wah Chang Albany Superfund Site, Millersburg, Oregon. June 10.

EPA, 1995. Record of Decision Declaration, Decision Summary, and Responsiveness Summary for Final Remedial Action for Surface and Subsurface Soil Operable Unit, Teledyne Wah Chang Albany Superfund Site, Millersburg, Oregon. September 27.

EPA, 1998. Explanation of Significant Differences from the June 10, 1994 ROD for Final Remedial Action of Groundwater and Sediment Operable Unit. Prepared by the U. S. Environmental Protection Agency. October 8, 1996.

EPA, 2008. Third 5-Year Review Report for the Teledyne Wah Chang Superfund Site. Prepared by: U.S. Environmental Protection Agency Region 10. January.

EPA, 2011. Email from Ravi Sanga (EPA) to Noel Mak (TDY) RE: 2010 Solids Area Annual – EPA comments.



LEGEND

- Site Area
- Railroad
- County Boundary

FIGURE 1

TDY Site Map

Farm Ponds Conceptual Site Model

ATI Millersburg Operations, Oregon

N

0 400 800 1,200

Feet

GSI Water Solutions, Inc.

Date: November 1, 2018
Data Sources: OGIC, USGS, DigiGlobe

Document Path: Y:\0168_Wah_Chang\Source_Figures\027_2018\Ongoing_Technical_Assistance\Figure1_TDY_SiteMap.mxd

FIGURE 2

Farm Ponds Area Location Map

Farm Ponds Conceptual Site Model

ATI Millersburg Operations, Oregon

LEGEND

- Site Area
- Tax Lot Subject to Deletion Request
- Tax Lot
- Railroad

N

0 250 500 750

Feet

Date: October 30, 2018

Data Sources: Linn Co., OGIC, USGS, DigiGlobe

GSI Water Solutions, Inc.

Document Path: Y:\0168_Wah_Chang\Source_Figures\027_2018\Ongoing_Technical_Assistance\Figure2_FarmSite.mxd